

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 1:20-00962
MICHAEL D. NOLAN	: Chapter 13
LINDA R. NOLAN	:
Debtor	:
	:
US BANK TRUST NATIONAL ASSOCIATION,	:
NOT IN ITS INDIVIDUAL CAPACITY, BUT	:
SOLELY AS TRUSTEE OF CITIGROUP	:
MORTGAGE LOAN TRUST 2018-C	:
Movant	:
vs.	:
	:
MICHAEL D. NOLAN	:
LINDA R. NOLAN	:
Debtor/Respondent	:

ANSWER TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Debtors, Michael D. and Linda R. Nolan, by and through his attorney, James H. Turner, Esquire and Answers the Motion for Relief from Stay filed by CITIGROUP MORTGAGE as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtors entered into bankruptcy on March 12, 2020 requiring their first post-petition payment to be in April. Debtor's have made both April and May payments and are now due for June.
7. Denied. Debtors are in arrears one month for \$1,130.50.

8. Denied. This is a conclusion of law to which no responsive pleading is necessary.
9. Denied. Debtor feels this amount is excessive.
10. Admitted.

WHEREFORE, Debtor/Respondent requests this Honorable Court deny the Movant's Motion for Relief From Stay and schedule a hearing on this matter at the Court's earliest possible convenience.

Respectfully submitted,
/s/ James H. Turner
James H. Turner
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CERTIFICATE OF SERVICE

I, James H. Turner, hereby certify that I served a true and correct copy of the foregoing by depositing a true and correct copy in the U.S. mail, first class postage prepaid, addressed, or e-mail as follows:

Charles J. DeHart III, Esquire
8125 Adams Drive
Suite A
Hummelstown, PA 17036

James C. Warmbrodt, Esquire
KML Law Group P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106

Date: 7/6/20

/s/ James H. Turner
James H. Turner